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7 *Representing the United States of America*

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9                   **UNITED STATES DISTRICT COURT**  
10                   **DISTRICT OF NEVADA**

11                   **United States of America,**

12                   Plaintiff,

13                   v.

14                   **Svyatoslav Bondarenko, et al.**

15                   Defendants.

Case No. 2:17-cr-306-JCM-PAL

**Government's Unopposed Motion  
for Extension of Time re:  
Complex Case Schedule**

**(First Request)**

17                   The United States of America, by and through DAYLE ELIESON, United  
18 States Attorney, CHAD W. MCHENRY, Assistant United States Attorney, and  
19 KELLY PEARSON, Trial Attorney, respectfully submits this motion for an extension  
20 of time in which a complex case schedule may be filed pursuant to LCR 16-1(a).

## FACTS

1. The Indictment in this case was returned under seal by a federal Grand Jury seated in Las Vegas, Nevada, on September 19, 2017. ECF No. 301 (redacted and unsealed Indictment). Superseding and Second Superseding Indictments, also under seal, were returned by the same Grand Jury on October 31, 2017, and January 30, 2018, respectively. ECF Nos. 302 (redacted and unsealed Superseding Indictment), 303 (redacted and unsealed Second Superseding Indictment).

2. Defendant Pius Wilson (#23) made his initial appearance in this District on March 6, 2018, and is represented by attorney Todd Spodek.

3. Defendant David Vargas (#27) made his initial appearance in this District on March 7, 2018, and is represented by the Federal Public Defender.

4. Defendant Sergey Medvedev (#2) made his initial appearance in this District on March 12, 2018, and is represented by attorney Lance Maningo.

5. Defendant Jose Gamboa (#19) made his initial appearance in this District on March 15, 2018, and is represented by attorney Thomas Ericsson.

6. Defendant John Telusma (#16) made his initial appearance in the Eastern District of New York on February 7, 2018, and will make his initial appearance in this District on March 21, 2018. He is represented by attorney Crane Pomerantz.

7. At this time, the remaining defendants in this case that the Government is aware of are either pending extradition proceedings and seem unlikely to appear before the Court in the immediate future, or are fugitives from justice.

8. Pursuant to LCR 16-1(a)(2) and (a)(3), the parties have 14 days at most from the date of the initial appearance hearing to file a complex case schedule. This would place the filing deadline for the earliest defendant at March 20, 2018.

9. Counsel for the Government have conferred with the above-named defense counsel, and they have no objection to this proposed extension of time.

**RELIEF REQUESTED**

The Government respectfully moves this Court to extend the allowable time during which a complex case schedule may be filed by the parties, fixing the new deadline at April 4, 2018, or 14 days following Defendant Telusma's anticipated initial appearance. This will ensure that all counsel representing this first cohort of defendants have the opportunity to review and provide input to the parties' proposed complex case schedule before it is filed with the Court.

**DATED** this 15th day of March, 2018.

Respectfully submitted,

**DAYLE ELIESON**  
United States Attorney

/ s / *Chad McHenry*

CHAD W. MCHENRY  
Assistant United States Attorney

KELLY PEARSON  
Trial Attorney

1                   CERTIFICATE OF SERVICE

2                   I certify that I am an employee of the United States Attorney's Office. A copy  
3 of the foregoing **GOVERNMENT'S UNOPPOSED MOTION FOR EXTENSION**  
4 **OF TIME RE: COMPLEX CASE SCHEDULE** was served upon counsel of record  
5 via Electronic Case Filing (ECF).

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7                   **DATED** this 15th day of March, 2018.

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9                   */ s / Chad McHenry*

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CHAD W. MCHENRY  
11                  Assistant United States Attorney

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4                   **UNITED STATES DISTRICT COURT**  
5                   **DISTRICT OF NEVADA**

6                   **United States of America,**

7                   Plaintiff,

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9                   **Svyatoslav Bondarenko, et al.**

10                  Defendants.

Case No. 2:17-cr-306-JCM-PAL

Order on Extension of Time  
re: Complex Case Schedule

12                  The Court having considered the proffer and unopposed motion submitted by  
13                  the Government, and good cause appearing:

14                  **IT IS ORDERED** that the deadline to file a complex case schedule in the  
15                  above-captioned case is set to April 4, 2018.

17                  **DATED** this 21st day of March, 2018.

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21                  Hon. Peggy A. Leen  
22                  United States Magistrate Judge  
                    District of Nevada